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STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

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State Counsel Division

BY HAND

Honorable Raymond J. Dearie
United States District Court Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

April 19, 2005
The Court grants a 60 day
extension for defendant to
respond; defendant shall
respond by
Tuesday June 21, 2005. **SO ORDERED.**

JAMES B. HENLY
Assistant Attorney General in Charge
Litigation Bureau

Dated: Brooklyn, New York
April 21, 2005

s/ Judge Raymond J. Dearie

RAYMOND J. DEARIE
United States District Judge

Dear Judge Dearie:

This office represents defendants the Honorable Jaime A. Rios, the Honorable Steven W. Fisher, Anthony D'Angelis, Robert W. Gardner, Sandra Newsome, and Heidi Higgins (collectively "State defendants") in the above-referenced action. In addition, this office anticipates representing the Honorable Jonathan Lippman and Lauren DeSole once they are served and have requested representation.

I write to request a ninety (90) day extension of time to respond to the complaint. Plaintiff pro se has advised this office that she would not consent to any requests for additional time to respond to the complaint. No prior request for an extension has been made.

This extension of time is necessary to allow this office time to review the complaint, which is ninety three (93) pages plus exhibits and contains two hundred sixty five (265) paragraphs, with each of the State defendants and prepare a proper response for each party. This extension will also allow this office to review any relevant records. Accordingly, it is respectfully requested that State defendants be granted a ninety (90) day extension of time to respond to the complaint.

Hon. Raymond J. Dearie
April 19, 2005
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Thank you for your attention to this matter.

Respectfully submitted,



Constantine A. Speres (CAS-9100)
Assistant Attorney General

cc. Judith B. Memblatt (Via Express Mail)

Honorable Lois Bloom (By Hand)
United States Magistrate Judge

Madeleine S. Egelfeld, Esq. (Via Express Mail)
Attorney for Defendant Koslowitz